

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

IN RE: STACEY N. SHIELDS

CASE NO. 14-28942-E
CHAPTER 13

Debtor(s)

STACEY N. SHIELDS

Plaintiff(s)

vs.

**Adversary Proceeding
Number:**

WELLS FARGO AUTO FINANCE

Defendant(s)

COMPLAINT FOR TURNOVER OF PROPERTY TO THE ESTATE

The Debtor(s), as Plaintiff(s), brings this complaint for turnover of property to the estate pursuant to FED. R. BANKR. P. 7001(1) and 11 U.S.C. § 542(a) to recover the 2003 CHEVY TAHOE repossessed by WELLS FARGO AUTO FINANCE.

The Court has jurisdiction of this case under the provisions of 28 U.S.C. §§ 1334(b) and 157(a). By virtue of 28 U.S.C. § 157(b)(2)(E), this is a core proceeding.

Under the particular facts and circumstances, and applicable law, the Plaintiff is entitled to possession of the above-described property of the estate for “use” as contemplated in 11 U.S.C. § 363.

WHEREFORE, the Debtor(s) as Plaintiff(s) respectfully requests that an expedited hearing be set to consider the requested relief, and that the court enter its order directing the Defendant to return the above said collateral.

Attorney for the Plaintiff(s)
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CERTIFICATE OF SERVICE

The undersigned party, attorney for a party, or agent hereby certifies that the above Complaint will be promptly served, postage prepaid, or hand-delivered to all interested parties listed herein below. **Date of Service August 29, 2014.**

/s/ Sidney A. Feuerstein
Attorney for Debtor(s)

cc:
Debtor (USPS)
Trustee (email)
Wells Fargo Auto Finance (USPS)
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